

IN THE DISTRICT COURT OF DOUGLAS COUNTY NEBRASKA

THOMAS BARRETT,)	CASE NO. CI 22-
)	
Plaintiff,)	COMPLAINT
)	(Suit for Damages)
vs)	
)	
B BAR R LIVESTOCK)	
TRANSPORTATION INC., and)	
LUKE JOHNSON,)	
)	
Defendants.)	

COMES NOW the Plaintiff and for his cause of action against the Defendants, and each of them, states:

1. Plaintiff is a resident of Sarpy County, Nebraska.
2. Defendant B Bar R Livestock Transportation Inc. (hereinafter "Defendant B Bar R") is a foreign corporation conducting business in Douglas County, Nebraska.
3. Defendant Luke Johnson is a resident of Harrison County, Iowa.
4. This cause of action arises from an motor vehicle collision between Plaintiff and Defendant Johnson on July 26, 2021, at approximately 9:30 AM on westbound Interstate 80 near mile marker 448 in Omaha, Douglas County, Nebraska.
5. For all purposes material herein, Plaintiff was the operator of a 2016 Mercedes Metris automobile and the Defendant Johnson was the operator of a 2001 International semi-truck owned by Defendant B Bar R.
6. On the date, time, and location referenced in paragraph four, Defendant Johnson operated the front of the semi-truck he was driving into the rear of the vehicle Plaintiff was driving.
7. The collision referenced in paragraphs four and six was occasioned by the negligence of Defendant Johnson.
8. On the aforementioned date, time, and place Defendant Johnson was operating the truck owned by Defendant B Bar R on behalf of and in the scope and course of his employment with Defendant B Bar R.
9. As a direct and proximate result of Defendant Johnson's negligence, Plaintiff sustained the following damages:

- a. **Personal injuries;** It is believed said injuries are permanent in nature;
 - b. **Property damage** in an amount to be determined;
 - c. **Lost wages** in an amount to be determined; and
 - d. **Medical expenses** in an amount to be determined.
10. That on the date of filing this Complaint Plaintiff is 41 years old and has a 32.71 year life expectancy.

WHEREFORE, Plaintiff prays for judgment against the Defendants, and each of them, in the amount of his special damages, general damages, and the costs of this action.

Dated: August 18, 2022.

THOMAS BARRETT, Plaintiff

By: /s/ Benjamin C. Knowles
Benjamin C. Knowles, #24687
James W. Knowles, Jr., #16596
Knowles Law Firm
First National Plaza, No. 450
11404 West Dodge Road
Omaha, Nebraska 68154-2576
P (402) 431-9000
F (402) 431-9099
ben@knowleslawfirm.com
Attorneys for Plaintiff

IN THE DISTRICT COURT OF DOUGLAS COUNTY NEBRASKA

THOMAS BARRETT,)	CASE NO. CI 22-
)	
Plaintiff,)	
)	PRAECIPE
vs)	
)	
B BAR R LIVESTOCK)	
TRANSPORTATION INC., and)	
LUKE JOHNSON,)	
)	
Defendants.)	

Please issue summons for service by **certified mail** to the registered agent of Defendant B Bar R Livestock Transportation Inc.:

Leslie Brown
1545 250th St.
Denison, IA 51442

Please issue summons for service on Defendant Luke Johnson by **certified mail** at his usual residence, to-wit:

2083 194th St.
Mondamin, IA 51557

Please return summonses to attorney for Plaintiff by electronic mail to ben@knowleslawfirm.com.

Dated: August 18, 2022

THOMAS BARRETT, Plaintiff

By: /s/ Benjamin C. Knowles
Benjamin C. Knowles, #24687
James W. Knowles, Jr., #16596
Knowles Law Firm
First National Plaza, No. 450
11404 West Dodge Road
Omaha, Nebraska 68154-2576
(402) 431-9000
FAX (402) 431-9099
ben@knowleslawfirm.com
Attorneys for Plaintiff

Image ID:
D00811475D01**SUMMONS**

Doc. No. 811475

IN THE DISTRICT COURT OF Douglas COUNTY, NEBRASKA
 1701 Farnam
 Omaha NE 68183

Thomas Barrett v. B Bar R Livestock Transport Inc

Case ID: CI 22 6348

TO: B Bar R Livestock Transport Inc

FILED BYClerk of the Douglas District Court
08/19/2022

You have been sued by the following plaintiff(s):

Thomas Barrett

Plaintiff's Attorney: Benjamin C Knowles
 Address: 11404 West Dodge Road, Suite 450
 Omaha, NE 68154-2576

Telephone: (402) 431-9000

A copy of the complaint/petition is attached. To defend this lawsuit, an appropriate response must be served on the parties and filed with the office of the clerk of the court within 30 days of service of the complaint/petition. If you fail to respond, the court may enter judgment for the relief demanded in the complaint/petition.

Nebraska Supreme Court Rule 2-208 requires individuals involved in a case who are not attorneys and representing themselves to provide their email address to the court in order to receive notice by email from the court about the case. Complete and return the attached form to the court if representing yourself.

Date: AUGUST 19, 2022

BY THE COURT:


 John M. Friend
 Clerk


Image ID:
D00811475D01

SUMMONS

Doc. No. 811475

PLAINTIFF'S DIRECTIONS FOR SERVICE OF SUMMONS AND A COPY OF THE COMPLAINT/PETITION ON:

B Bar R Livestock Transport Inc
c/o Leslie Brown - RA
1545 250th St.
Denison, IA 51442

Method of service: Certified Mail

You are directed to make such service within ten days after the date of issue, and file with the court clerk proof of service within ten days after the signed receipt is received or is available electronically, whichever occurs first.

SERVICE RETURN

Doc. No. 811475

Douglas District Court
 1701 Farnam
 Omaha NE 68183

To:

Case ID: CI 22 6348 Barrett v. B Bar R Livestock Transport I

Received this Summons on _____, _____. I hereby certify that on
 _____, ____ at _____ o'clock __M. I served copies of the Summons
 upon the party:

by _____

as required by Nebraska state law.

Service and return \$ _____

Copy _____

Mileage ____ miles _____

TOTAL \$ _____

Date: _____ BY: _____
 (Sheriff or authorized person)

CERTIFIED MAIL PROOF OF SERVICE

Copies of the Summons were mailed by certified mail,
 TO THE PARTY: _____

At the following address: _____

on the _____ day of _____, as required by Nebraska state law.

Postage \$ _____ Attorney for: _____

The return receipt for mailing to the party was signed on _____, _____.

To: B Bar R Livestock Transport Inc
 c/o Leslie Brown - RA
 1545 250th St.
 Denison, IA 51442

From: Benjamin C Knowles
 11404 West Dodge Road, Suite 450
 Omaha, NE 68154-2576

ATTACH RETURN RECEIPT & RETURN TO COURT

Image ID:
D00811476D01**SUMMONS**

Doc. No. 811476

IN THE DISTRICT COURT OF Douglas COUNTY, NEBRASKA
 1701 Farnam
 Omaha NE 68183

Thomas Barrett v. B Bar R Livestock Transport Inc

Case ID: CI 22 6348

TO: Luke Johnson

FILED BYClerk of the Douglas District Court
08/19/2022

You have been sued by the following plaintiff(s):

Thomas Barrett

Plaintiff's Attorney: Benjamin C Knowles
 Address: 11404 West Dodge Road, Suite 450
 Omaha, NE 68154-2576

Telephone: (402) 431-9000

A copy of the complaint/petition is attached. To defend this lawsuit, an appropriate response must be served on the parties and filed with the office of the clerk of the court within 30 days of service of the complaint/petition. If you fail to respond, the court may enter judgment for the relief demanded in the complaint/petition.

Nebraska Supreme Court Rule 2-208 requires individuals involved in a case who are not attorneys and representing themselves to provide their email address to the court in order to receive notice by email from the court about the case. Complete and return the attached form to the court if representing yourself.

Date: AUGUST 19, 2022

BY THE COURT:




Image ID:
D00811476D01

SUMMONS

Doc. No. 811476

PLAINTIFF'S DIRECTIONS FOR SERVICE OF SUMMONS AND A COPY OF THE COMPLAINT/PETITION ON:

Luke Johnson
2083 194th St.
Mondamin, IA 51557

Method of service: Certified Mail

You are directed to make such service within ten days after the date of issue, and file with the court clerk proof of service within ten days after the signed receipt is received or is available electronically, whichever occurs first.

SERVICE RETURN

Doc. No. 811476

Douglas District Court
 1701 Farnam
 Omaha NE 68183

To:

Case ID: CI 22 6348 Barrett v. B Bar R Livestock Transport I

Received this Summons on _____, _____. I hereby certify that on

_____, ____ at _____ o'clock __M. I served copies of the Summons upon the party:

 by _____

as required by Nebraska state law.

Service and return \$ _____

Copy _____

Mileage ___ miles _____

TOTAL \$ _____

Date: _____ BY: _____
 (Sheriff or authorized person)

CERTIFIED MAIL
PROOF OF SERVICE

Copies of the Summons were mailed by certified mail,
 TO THE PARTY: _____At the following address: _____

 _____on the _____ day of _____, as required by Nebraska state law.

Postage \$ _____ Attorney for: _____

The return receipt for mailing to the party was signed on _____, _____.

To: Luke Johnson
 2083 194th St.
 Mondamin, IA 51557

From: Benjamin C Knowles
 11404 West Dodge Road, Suite 450
 Omaha, NE 68154-2576

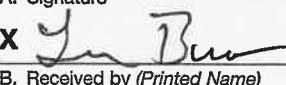
ATTACH RETURN RECEIPT & RETURN TO COURT

SERVICE RETURN

Douglas District Court
1701 Farnam
Omaha NE 68183

To:

Case ID: CI 22 6348 Barrett v. B Bar R Livestock Transport I

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY		
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input checked="" type="checkbox"/>  <input type="checkbox"/> Agent <input type="checkbox"/> Addressee B. Received by (Printed Name) <input type="text" value="Les Brown"/> C. Date of Delivery <input type="text" value="8/22"/>		
1. Article Addressed to:	<p>B Bar R Livestock Transport Inc c/o Leslie Brown - RA 1545 250th Street Denison IA 51442</p> <p> 9590 9402 7236 1284 6547 74</p> <p>2  7015 0920 0000 3118 8629</p>		
3. Service Type	<input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Restricted Delivery		
PS Form 3811, July 2020 PSN 7530-02-000-9053 Date: <u>8/22/2022</u> By: <u>Thomas Barrett</u> (Sheriff or authorized person)			

CERTIFIED MAIL PROOF OF SERVICE

Copies of the Summons were mailed by certified mail,
TO THE PARTY: B Bar R Livestock Transportation Inc

At the following address: c/o Leslie Brown, Registered Agent

1545 250th St., Denison, IA 51442

on the 19th day of August 2022, as required by Nebraska state law.

Postage \$ 8.06 Attorney for: Benjamin C Knowles Plaintiff

The return receipt for mailing to the party was signed on August 22, 2022.

To: B Bar R Livestock Transport Inc
c/o Leslie Brown - RA
1545 250th St.
Denison, IA 51442

From: Benjamin C Knowles
11404 West Dodge Road, Suite 450
Omaha, NE 68154-2576

ATTACH RETURN RECEIPT & RETURN TO COURT

Certificate of Service

I hereby certify that on Wednesday, August 24, 2022 I provided a true and correct copy of the Return-Summons/Alias Summons to the following:

Barrett,Thomas, represented by Knowles,James,W,Jr (Bar Number: 16596) service method: Electronic Service to jim@knowleslawfirm.com

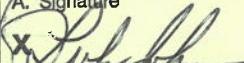
Signature: /s/ Benjamin C Knowles (Bar Number: 24687)

SERVICE RETURN

Douglas District Court
1701 Farnam
Omaha NE 68183

To:

Case ID: CI 22 6348 Barrett v. B Bar R Livestock Transport I

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <input type="checkbox"/> Complete items 1, 2, and 3. <input type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits. 		A. Signature  <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee B. Received by (Printed Name) C. Date of Delivery Luke Johnson 3/24/22 D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No Thomas Barrett	
1. Article Addressed to: Luke Johnson 2083 194th Street Mondamin IA 51557  9590 9402 7236 1284 6547 50 <input type="checkbox"/> Article Number (Transfer from service label)		3. Service Type <ul style="list-style-type: none"> <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Mail <input type="checkbox"/> Mail Restricted Delivery 	
7015 0920 0000 3118 8636		<input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery	
PS Form 3811, July 2020 PSN 7530-02-000-9053 Date: _____ BY: _____		Domestic Return Receipt (Sheriff or authorized person)	

CERTIFIED MAIL PROOF OF SERVICE

Copies of the Summons were mailed by certified mail,
TO THE PARTY: Luke Johnson

At the following address: 2083 194th St., Mondamin, IA 51557

on the 19th day of August 2022, as required by Nebraska state law.

Postage \$ 8.06 Attorney for: Plaintiff

The return receipt for mailing to the party was signed on August 24, 2022.

To: Luke Johnson
2083 194th St.

From: Benjamin C Knowles
11404 West Dodge Road, Suite 450
Omaha, NE 68154-2576

Mondamin, IA 51557

ATTACH RETURN RECEIPT & RETURN TO COURT

Certificate of Service

I hereby certify that on Tuesday, August 30, 2022 I provided a true and correct copy of the Return-Summons/Alias Summons to the following:

Barrett,Thomas, represented by Knowles,James,W,Jr (Bar Number: 16596) service method: Electronic Service to jim@knowleslawfirm.com

Signature: /s/ Benjamin C Knowles (Bar Number: 24687)